

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN SECTION
CASE NUMBER 03 CV 30306 MAP

STERLING ENGINEERING CORPORATION,

Plaintiff,

vs.

PIONEER MANAGEMENT SYSTEMS, INC.,

Defendant,

vs.

STANDARD SECURITY LIFE INSURANCE
COMPANY OF NEW YORK and MARLTON
RISK MANAGEMENT, INC.,

Third Party Defendants.

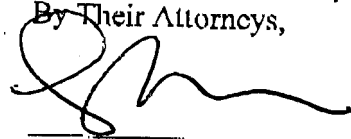
**MOTION TO ENLARGE TIME IN WHICH TO CONDUCT DISCOVERY
ASSENTED TO**

Now comes Standard Security Insurance Company of New York, the Third Party Defendant who states that:

1. The parties are agreeable to Mediation before Judge Neiman.
2. That because of vacation schedules and trial schedules and the need to obtain factual discovery that the parties are not yet ready to engage in a meaningful dialogue at Mediation.
3. That the schedule of discovery and of a Pre-Trial Conference should be allotted a reasonable amount of time to be completed.

WHEREFORE, the Third Party Defendant moves this Honorable Court allow it and the other litigants to conduct fact discovery up to and until October 31, 2004 and that the Pre-Trial Conference presently scheduled for October 6, 2004 be continued until a date in early November.

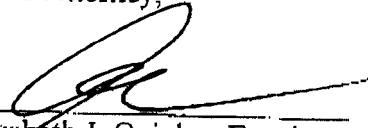
The Third Party Defendant,
Standard Security Insurance
Company of New York,
By Their Attorneys,



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Dated: 9-25-04

The Plaintiff,
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Pioneer Management Systems, Inc.
By Its Attorney,

Bernard T. O'Connor Jr by 

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